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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS
291 Promenade Street
Providence, R.I. 02908-5767

August 27, 1992

Mr. Francisco La Greca
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19133-2090

Dear Mr. La Greca:

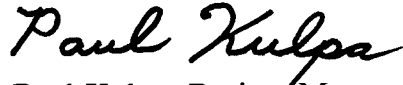
Please find attached comments generated by the Rhode Island Department of Environmental Management (RIDEM), Division of Groundwater and ISDS, on the Draft Interim Record of Decision (ROD) for Ground Water Remediation near Tanks 53 and 56, Tank Farm 5 at the Naval Education and Training Center (NETC), Newport, Rhode Island. Please note that the Groundwater Classification Regulations are considered to be location specific ARARs and should be so designated in the ROD. Groundwater Regulations are covered under Rhode Island General Laws 46-13.1 et seq.

The draft Interim ROD does not address State Wetland Regulations. The State Wetland Regulation will apply if any activity at the Tank Farm affect wetlands. Such activities include, but are not limited to: erosion material from construction activities entering wetlands, alteration of wetland hydrology by either direct discharge into wetlands or the alteration of the groundwater hydrology, etc. The Rhode Island Wetland Regulations are covered under Rhode Island General Laws 2-1-18 et seq.

Comments concerning the Rhode Island Pollution Discharge Elimination Systems ARARs will be posted under a separate letter. The Rhode Island Water Pollution Regulations are covered under Rhode Island General Laws 46-12 et seq. Please note that discharges into the Bay also require approval from the Rhode Island Coastal Resource Management Council (CRMC).

Please be advised that if the preferred remedial alternative is not implemented other State ARARs may be applicable. Please contact this office at 401-277-2797 if Northern Division has any questions or concerns with the above.

Sincerely,

A handwritten signature in black ink that reads "Paul Kulpa". The signature is written in a cursive, flowing style.

Paul Kulpa, Project Manager
Division of Air and Hazardous Materials


cc: Dean Albro, RIDEM Chief of Wetlands
Warren Angell II, RIDEM DAHM
Carol Keating, US EPA
Carlene Newman, RIDEM Permits and Planning

Rhode Island Department of Environmental Management
Division of Groundwater and ISDS
GROUNDWATER SECTION
291 Promenade Street
Providence, RI 02908
(401) 277-2234

MEMORANDUM

To: Paul Kulpa
Environmental Coordination

August 21, 1992

From: Ernest C. Panciera 
Senior Environmental Planner

Subject: Comments on revisions to the Interim ROD for Tanks 53 and 56, Tank Farm 5,
Middletown, RI

I have reviewed the revisions to the Interim Record of Decision for Tanks 53 and 56 at Tank Farm 5 in Middletown faxed to you August 17, 1992, and I have comments on the section labelled "Interim Ground Water Cleanup Levels."

The discussion in the text and the cleanup levels in Table 3 treat the preventive action limits (PALs) from the RIDEM Groundwater Section "Rules and Regulations for Groundwater Quality," May 1992 as ARARs, and therefore they are designated as cleanup levels for some contaminants. The PALs were not established as cleanup levels for groundwater remediation. The groundwater quality standards established in the regulations should be used as ARARs, not the PALs.

It is the policy of the RIDEM to apply the PALs to those facilities that are monitoring groundwater quality in response to a permitted discharge to groundwater. If the groundwater monitoring for this discharge shows that a contaminant has exceeded the PAL, the DEM has the authority to require the facility owner or operator to take action in order to prevent the later exceedance of a groundwater quality standard. The PALs are to be used as a tool to prevent contamination from exceeding the standard. Once a standard has been exceeded the groundwater regulations require the owner or operator to take actions subject to the approval of DEM "... to regain and maintain compliance with the groundwater quality at the point of compliance" (section 15.02).

Also, note that in revisions to Table 3 the cleanup level for 1,1,1-Trichlorethane is specified as 100 ppb and the basis is the MCLG. The MCLG for this contaminant is 200 ppb. It is also suggested that it be noted that the level for chromium is total chromium.

cc: Sue Kiernan